REMARKS/ARGUMENTS

These remarks are submitted in response to the Office Action of March 27, 2006 (hereinafter Office Action). As this response has been timely filed within the 3-month shortened statutory period, no fee is believed due. Nonetheless, the Examiner is expressly authorized to charge any deficiencies or credit any overpayment to Deposit Account No. 50-0951.

Claims 1-18 were rejected under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent No. 6,662,178 to Lee (hereinafter Lee). Claims 1-18 also were rejected under 35 U.S.C. § 112, second paragraph.

Applicants have amended independent Claims 1, 9, and 16 to emphasize certain aspects of the invention. Applicants also have amended dependent Claims 3-5 and 10-12 to further emphasize certain additional aspects of the invention. The claim amendments also address the rejections under 35 U.S.C. § 112, second paragraph, by clarifying that according to the invention grammar files are sorted by different criteria. The claim amendments, as discussed herein, are fully supported throughout the Specification. (See, e.g., Specification, paragraphs [0005], [0006], [0019], and [0020].) No new matter has been introduced by the claim amendments.

Applicants' Invention

It may be useful to reiterate certain aspects of Applicants' invention prior to addressing the cited reference. One embodiment of the invention, typified by Claim 1, as amended, is a method of arranging grammar files in a presentation list. The method can include receiving a system request to visually display the grammar files within a graphical user interface in the form of a presentation list. The method can further include sorting the grammar files based on a first criteria that assigns user-defined grammar files priority over built-in grammar files, and then, sorting the grammar files according to a second criteria. Once sorted, the grammar files can be visually displayed as a

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presentation list such that each user-defined grammar file is visually distinguishable from each built-in grammar file.

The Claims Define Over The Prior Art

As already noted, each of the independent claims was rejected as being anticipated by Lee. Lee is directed to an apparatus and method for searching and organizing intellectual property (IP) information. (See, e.g., Col. 1, line 50 – Col. 2, line 11; see also Abstract.) In particular, the apparatus and method of Lee each utilizes an IP thesaurus that provides a list of elements common to IP information. (See, e.g., Col. 8, line 12 – Col. 9, line 25.)

At page 3 of the Office Action, it is stated that Lee's retrieval of IP information in response to a search query is "equivalent" to Applicants' invention's sorting grammar files in response to a request to display grammar files. In portions cited in the Office Action, Lee provides:

" Search engine 304 may provide text-based, graphics-based, code-based, or other search/query mechanisms to produce search results to be viewed, accessed, or otherwise output from SO server 30 (e.g., to user 35). In an exemplary embodiment, for example, search engine 304 performs searches based on input data such as: identification numbers (e.g., patent number); keywords; text or graphics in select fields (e.g., different segments or information fields of documents such as Publication Number, Publication Date, (Tile, Inventor, Assignee, Application Number, Filing Date, Related Data, Priority Data, International Classification, U.S. Classification, Cross-Reference Classification, Field of Search, References Cited, Forward References Citing Document, Examiner, Agent, Abstract, Background, Field of Invention, Summary, Brief Description of Drawings, Detailed

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Description, Claims, Drawings, etc.); Boolean logic characters, or other search criteria (e.g., date restrictions, etc.)." (Col. 4, lines 12-29.)

* * *

"SO server 30 makes the search results (and any available underlying documents listed) available for viewing or other output (e.g., print, e-mail, fax, etc.) by user 35 (or other systems). <u>In a preferred embodiment, the search results are presented as an ordered list. The search results may be ordered, sorted, and reordered in accordance with one or more known order preferences set by a user</u> (e.g., date, alphabetical by title, inventor, assignee, relevancy, weighted relevancy, scoring formula, etc.)." (Col. 4, lines 49-57.) (Emphasis supplied.)

As the quoted language reveals, Lee speaks to the presentment of an ordered list, but nowhere addresses grammar files, let alone sorting of grammar files according to the criteria recited in each of independent Claims 1, 8, and 16.

The asserted equivalency between Lee's query-initiated display of search results and Applicants' sorting of grammar files according to whether the files are user-defined or built-in is said to follow because "user-defined files [in Applicants' invention] are the files that satisfy [Lee's] search query, and are thus given a grater priority by being displayed," and "[t]he built-in files are the files in a database [which in Lee] <u>are not displayed because the do not match the query</u>." (Office Action, page 3.) (Emphasis supplied.) This, however, is a fundamental difference between Lee's technique and Applicants' invention.

As observed in the Office Action, Lee presents only files that satisfy a search criteria and fails to present, or blocks presentment of, all files. One of the features of Applicants' invention, by contrast, is to visually juxtapose files that satisfy a specified criterion with those that do not. Specifically, Applicants' invention presents user-defined

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grammar files along with built-in grammar files, but presents each type of grammar file in a manner that makes the two different types of files visually distinguishable from one another. This is one of the features of Applicants' invention that allows callflow designers to more efficiently work with both types of grammar files is building a callflow model. (See, e.g., Specification, paragraph [0004].)

Thus, regardless of whether Lee can be read as teaching the sorting of files so as to prioritize the files, Lee does not teach, expressly or inherently, any of the other features recited in independent Claims 1, 8, or 16, as amended. Firstly, Lee does not even inherently teach <u>visually displaying a presentation list of grammar files so that each user-defined grammar file is visually distinguishable from each built-in grammar file</u>. Lee's failure to teach this feature follows from Lee's distinguishing one type of file from another by presenting the former but not the latter, as noted in the Office Action.

Secondly, by presenting only one type of file that meets a selection criterion, Lee can not provide a presentment of different types of files distinguishable from one another on the basis of both first and second criteria, as recited in each of amended independent Claims 1, 8, and 16; that is, Lee provides no mechanism by which both user-defined and built-in grammar files, after being sorted so as to be distinguish one type from the other, can be <u>further sorted based on a second criteria</u>, as also recited in each of amended independent Claims 1, 8, and 16. (See also Specification, paragraphs [0016]-[0019], for examples of the different criteria.)

Accordingly, Lee fails to expressly or inherently teach every feature recited in amended independent Claims 1, 8, and 16. Applicants respectfully submit, therefore, that each of the independent claims, as amended, defines over the prior art. Applicants further respectfully submit that whereas each of the dependent claims depends from one of the amended independent claims while reciting additional features, dependent Claims 2-7, 9-15, 17, and 18, likewise define over the prior art.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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